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April 7, 2022

BY ELECTRONIC FILING

The Honorable Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *State of New York, et al. v. Biden et al.*, No. 17-cv-5228 (NGG) (VMS)
Batalla Vidal, et al. v. Mayorkas, et al., No. 16-cv-4756 (NGG) (VMS)

Dear Judge Garaufis:

The plaintiffs in *State of New York v. Biden*, No. 17-cv-5228 submit this letter following the pre-motion conference held on April 4, 2022 in *Batalla Vidal v. Mayorkas*, No. 16-cv-4756 (NGG) (VMS). During the conference, the Court granted the *New York* plaintiffs leave to file a submission regarding the *Batalla Vidal* plaintiffs' motion, which is due by April 25, 2022, and directed the parties to propose a schedule for such submission. (04/04/2022 Minute Entry.)

The parties have conferred and propose that the *New York* plaintiffs file a submission regarding the *Batalla Vidal* plaintiffs' forthcoming motion by May 20, 2022. The dates for the parties' filings set at the conference are unchanged.

The *New York* plaintiffs respectfully request that this letter be docketed in *Batalla Vidal v. Mayorkas*, No. 16-cv-4756 (NGG) (VMS). We also respectfully request that the Court So Order the schedule proposed herein.

Respectfully submitted,

LETITIA JAMES

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By: /s/ Ester Murdukhayeva

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of Oregon, Commonwealth of Pennsylvania,
State of Rhode Island, State of Vermont, and
the District of Columbia.*

cc: Counsel for Defendants (by ECF)

Counsel for the *Batalla Vidal* Plaintiffs (by email)

Application granted.

So Ordered.

s/Nicholas G. Garaufis

Hon. Nicholas G. Garaufis

Date: 4/11/22